

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

Keith Molineaux 30134

(Enter above the full name of the plaintiff
or plaintiffs in this action).

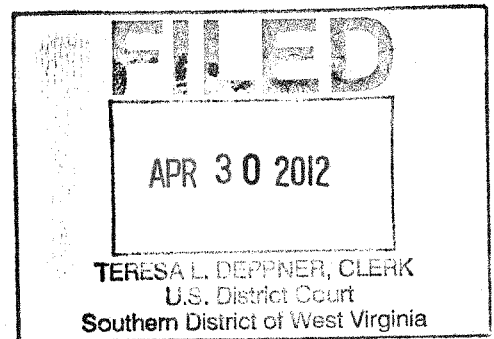
(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 2:12-1346
(Number to be assigned by Court)

SORAYA McCLUNG, D.R. Francis, Stephen King
Clarence R. Lane and T.G. White

(Enter above the full name of the defendant
or defendants in this action)



COMPLAINT

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes ☒ No ☐

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: Keith Martin Molineaux

Defendants: Director, Soraya McClung, D.R. Francis,
Stephen King, C.R. Lane, T.G. White,

2. Court (if federal court, name the district; if state court, name the county);

~~Pinckney County Circuit Court~~ and United States
District Court of Charleston

3. Docket Number: 2:11-CV-00811

4. Name of judge to whom case was assigned:

Thomas E. Johnson

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

Still pending

6. Approximate date of filing lawsuit: 10/31/11

7. Approximate date of disposition: Still pending

II. Place of Present Confinement: _____

A. Is there a prisoner grievance procedure in this institution?

Yes _____ No ☒

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes _____ No ☒

C. If you answer is YES:

1. What steps did you take? _____

2. What was the result? _____

D. If your answer is NO, explain why not: IT dose not involve

this prisen

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Keith Martin Molineaux, Jr

Address: One Mountainside Way Mt. Olive, WI. 53585

B. Additional Plaintiff(s) and Address(es): _____

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

- C. Defendant: Soraya McClung
is employed as: Director of Forensic Laboratory
at 725 Jefferson Road, South Charleston, W.V 25309
- D. Additional defendants: D.B. Francis, Stephen King,
Clarence B. Lane, T.G. White
- _____
- _____

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I filed re-filed a civil subpoena in the circuit court
of Fayette county circuit court. Along with a Freedom
of Information Act. Requesting only the complete
chain-of-custody from that laboratory on November
15, 2010 I receive only part of test results. for example
Look at the case submission form dated April 12, 2001
then look at the laboratory test result dated April 18, 2002
Well what was sent to the Laboratory to be tested

IV. Statement of Claim (continued):

which was sign for by Forensic Expert was not what was on the test results. Along with this other reports are missing such as the clothing, box of bullets, Marijuana etc. I have ^{reports} items that was submitted and test results of only part of what was sent to the laboratory. They refuse to send the plaintiff the complete chain-of-custody even after the plaintiff showed cause and explain how important it is to the Plaintiff pending Habeas. They refuse to acknowledge my request. When all I Ask for is "Simple" sign documentation of the Chain-of-Custody to show the complete record of every item submitted to be tested over (10) ten years ago.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

ALL I REQUEST FROM THIS HONORABLE COURT IS TO ORDER THE WEST VIRGINIA STATE FORENSIC Laboratory Director Soraya McClung and it's agencies experts ~~to~~ To Submit to the United State District Court a Complete Copy of the CHAIN-OF-CUSTODY TO PUT AN END TO THIS Confussion, My Goal is not to Ask for nothing but the Complete Chain-of-Custody of every item submitted to that laboratory to be tested in the Following cases submitted along with this Federal Complaint. because all cases are considered one.

V. Relief (continued)):

I only ask that the laboratory hand over every report requested in my civil subpoena filed on April 10, 2012. I have proof that clothing along with other items was tested at that laboratory. It's important that the court order them to mail it to the court not to plaintiff to avoid any misunderstanding of this issue and the court mail it to the plaintiff. If they fail to hand over these documents I ask the court to appoint counsel and a jury hearing in this matter.

VII. Counsel

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

N/A

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes ☒ No ☐

If so, state the name(s) and address(es) of each lawyer contacted:

~~Sam~~ D. Adrain Heosier, (Sam Baxter in Md)
a lot of attorneys my guess is because I have no money.

If not, state your reasons: Say he dont have right to do

Federal law

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes ☐ No ☒

If so, state the lawyer's name and address:

Signed this _____ day of _____, 20____.

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____
(Date)

Signature of Movant/Plaintiff

Signature of Attorney
(if any)